# **EXHIBIT A**

## **Perry Hoag**

From: Perry Hoag

**Sent:** Wednesday, January 22, 2020 5:48 PM **To:** Sara Harrigan; Patrick M Flaherty

Cc: Jon Hughes

Subject: to pltf atty - proposed court order on motion to dismiss & transfer (Mendoza v. Singh

et al 1:19 cv 03952)

Attachments: Proposed Order - transfer (00179835xE3C28).docx

1-22-20

Good afternoon, Sara & John,

Attached is a proposed court order. Because the motion on file is a motion to dismiss for lack of proper jurisdiction, I think the proper procedure is to dismiss the case in the Northern District - without prejudice to you refiling in the Missouri.

If this meets with your approval, we can have it filed tomorrow by stipulation.

I've also been advised that the defendant Reliable Transportation has recently been served with summons in the Northern District – and I think Reliable's appearance is due 1-23-20. Reliable's defense has been tendered to Nationwide (BSB's insurer), but the tender is under legal review. (I am copying Nationwide's counsel Jon Hughes on this email). In light of the fact that the case is going to end up in Missouri, do you have an objection to allowing Reliable not appear in the Northern District case?

Let's please plan on discussing these issues on Thursday (1-23).

#### **PERRY W. HOAG**

Cameli & Hoag, P.C. (312)726-7306

From: Sara Harrigan <sharrigan@kfkllaw.com> Sent: Thursday, January 16, 2020 2:44 PM

To: Perry Hoag <phoag@camelihoaglaw.com>; Patrick M Flaherty <pflaherty@KFKLLAW.COM>

Subject: RE: follow-up with pltf atty - motion to dismiss & transfer (Mendoza v. Singh et al 1:19 cv 03952)

Dear Mr. Hoag:

Attached you will find a draft order for your review. Please let us know if you approve or have changes.

Sara Harrigan (630) 449-0802

From: Perry Hoag <phoag@camelihoaglaw.com>
Sent: Thursday, January 16, 2020 11:32 AM
To: Patrick M Flaherty cpflaherty@KFKLLAW.COM>

## Case: 1:19-cv-03952 Document #: 46-1 Filed: 01/23/20 Page 3 of 4 PageID #:215

Cc: Sara Harrigan <sharrigan@kfkllaw.com>

Subject: follow-up with pltf atty - motion to dismiss & transfer (Mendoza v. Singh et al 1:19 cv 03952)

1-16-20

Good morning, Patrick,

Just following up - May I please receive your proposed court order transferring this case to the eastern District of Missouri? Thank you!

#### **PERRY W. HOAG**

(312)726-7306

From: Perry Hoag

Sent: Monday, January 13, 2020 9:17 AM

To: Patrick M Flaherty <pflaherty@KFKLLAW.COM>

Cc: Sara Harrigan < <a href="mailto:sharrigan@kfkllaw.com">sharrigan@kfkllaw.com</a>; Leighton Miller < <a href="mailto:lmiller@camelihoaglaw.com">lmiller@camelihoaglaw.com</a>> Subject: with pltf atty - motion to dismiss & transfer (Mendoza v. Singh et al 1:19 cv 03952)

1-13-20

Good morning, Patrick,

I look forward to, your proposed court order and motion to transfer this matter to the Eastern District of Missouri.

#### PERRY W. HOAG

Cameli & Hoag, P.C. (312)726-7306

From: Patrick M Flaherty cpflaherty@KFKLLAW.COM

Sent: Friday, January 10, 2020 4:00 PM

To: Perry Hoag phoag@camelihoaglaw.com>
Cc: Sara Harrigan <sharrigan@kfkllaw.com>

Subject: FW: Mendoza v. Singh et al 1:19 cv 03952

### Perry:

My paralegal can prepare and forward a draft order on Monday. I have no objections if you prefer to draft it.

Thanks. Have a good weekend.

Pat Flaherty

Patrick M. Flaherty Kinnally Flaherty Krentz Loran Hodge & Masur PC 2114 Deerpath Road Aurora, IL 60506 630-907-0909 630-907-0913 (fax) www.kfkllaw.com

From: Patrick M Flaherty

Sent: Friday, January 10, 2020 3:58 PM

## Case: 1:19-cv-03952 Document #: 46-1 Filed: 01/23/20 Page 4 of 4 PageID #:215

To: Eric Fulbright@ilnd.uscourts.gov

Cc: Sara Harrigan < <a href="mailto:sharrigan@kfkllaw.com">sharrigan@kfkllaw.com</a>>; Perry Hoag < <a href="mailto:phoag@camelihoaglaw.com">phoag@camelihoaglaw.com</a>>

Subject: Mendoza v. Singh et al 1:19 cv 03952

## Mr. Fulbright:

Rather than filing a response to the pending motions, Plaintiff will not oppose the transfer of this case to the Eastern District of Missouri. By copy of this e mail to Mr. Hoag, the parties will prepare and submit an agreed order as recommended by Judge Norgle.

Thank you for your consideration.

Pat Flaherty

Patrick M. Flaherty Kinnally Flaherty Krentz Loran Hodge & Masur PC 2114 Deerpath Road Aurora, IL 60506 630-907-0909 630-907-0913 (fax) www.kfkllaw.com

This email has been scanned for spam and viruses by Proofpoint Essentials. Click here to report this email as spam.